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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 MAXIMILIAN KLEIN, et al.,

17 Plaintiffs,

18 v.

19 META PLATFORMS, INC.,

20 Defendant.

21 Case No. 20-cv-08570-JD

22 Hon. James Donato

23 **DECLARATION OF BRIAN J. DUNNE
IN SUPPORT OF ADVERTISER
PLAINTIFFS' MOTION TO EXCLUDE
THE EXPERT REPORT AND
TESTIMONY OF DR. CATHERINE
TUCKER**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude the
7 Expert Report and Testimony of Dr. Catherine Tucker.

8 3. Attached as **Exhibit 1** is a true and correct copy of the Expert Report of Michael A.
9 Williams, Ph.D., dated July 7, 2023.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Expert Report of Joshua S. Gans,
11 dated July 7, 2023.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Advertiser Class Rebuttal Report
13 of Catherine Tucker, Ph.D., dated August 4, 2023.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Reply Report of Joshua S. Gans,
15 dated September 1, 2023.

16 7. Attached as **Exhibit 5** is a true and correct copy of the Expert Reply Report of Michael
17 A. Williams, Ph.D., dated September 15, 2023.

18 8. Attached as **Exhibit 6** is a true and correct copy of excerpts from deposition of Catherine
19 Tucker, Ph.D., dated September 26, 2023.

20 9. Attached as **Exhibit 7** is a true and correct copy of excerpts from the deposition of Alex
21 Schultz, dated March 31, 2023.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6,
23 2023, in Austin, Texas.

24 /s/ Brian J. Dunne

25 Brian J. Dunne

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